



E-RATE CENTRAL



**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Implementation of the Affordable
Connectivity Program

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WC Docket No. 21-450

**FURTHER NOTICE OF PROPOSED RULEMAKING REPLY COMMENTS ON THE
IMPLEMENTATION OF THE AFFORDABLE CONNECTIVITY PROGRAM
(WC Docket 21-450; DA 21-1453)**

E-Rate Central¹ and Westhab² submit these Reply Comments in response to the Further Notice of Proposed Rulemaking (“FNPRM”) on the implementation of the Affordable Connectivity Program (“ACP”).

¹ E-Rate Central operates under contract with the New York State Education Department (“NYSED”) to serve as the New York State E-Rate Coordinator.

² Westhab is the largest non-profit provider of affordable housing and support services in Westchester County, NY.

As indicated in its initial FNPRM comments, E-Rate Central and Westhab believe that the ACP will be a critical tool for extending affordable internet services to needy individuals and families. The ACP Report and Order, as currently structured, however, is focused primarily on discounting individual internet subscriptions. Although the rules do provide ACP benefits for bulk purchasing arrangements, they do so in a way that is at best inefficient, and at worst unworkable.

Academic research and outreach experience by non-profit organizations highlight the difficulty of convincing non-participating low-income individuals and families to subscribe to ACP.

In January 2022, the USC Annenberg School for Communications and Journalism released its Policy Brief #1 with regard to “Measuring the Effectiveness of Digital Inclusion Approaches” providing “[A Roadmap for Affordable Broadband: Lessons from the Emergency Broadband Benefit](#).” From our perspective, the key takeaways from the USC Annenberg’s study were that:

- The primary benefit of the EBB program was “alleviating the cost burden for eligible households that were already connected to broadband in 2019, with only modest impact in bringing those previously unconnected online;” and
- “[L]ow levels of awareness about the EBB program, as well as the lack of appropriate information about eligibility and the application process, depressed participation rates among key potential beneficiaries.”

These findings support the importance that an effective outreach program will have in achieving maximum ACP effectiveness. But not just any outreach! Simple awareness is not enough. New ACP participants — particularly those without existing internet access and user experience — must be led through the enrollment process.

As [CETF](#) noted in its initial FNPRM comments:

It is CETF’s experience that a number of client meetings are required to educate and coach unconnected customers through ACP enrollment and ISP sign-up. This is not a simple matter of advertising the program but requires multiple meetings of coaching and follow up.

The most efficient way to achieve ACP participation among residents of low-income multiple dwelling units, be they subsidized housing complexes or homeless shelters, is to encourage and permit bulk ACP subscriptions and ACP administration by the housing managers.

This approach is particularly important for homeless shelters as noted by CETF as one of its three key recommendations in its earlier filing, namely:

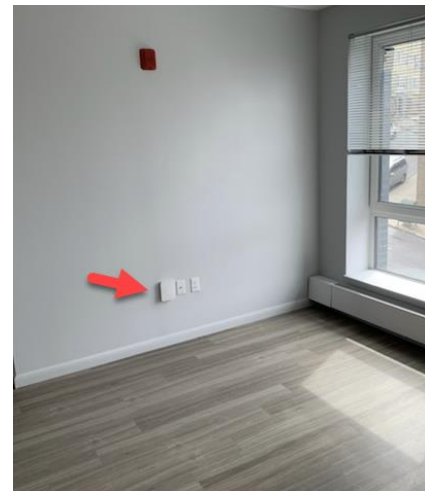
- Explicitly include homeless centers as eligible for support under multiple dwelling unit (“MDU”) provisions. The MDU definition and eligibility should include multi-family serving organizations and local government entities that purchase in bulk.

E-Rate Central and WestHab strongly support this recommendation. We note, however, that such an approach will require the removal of the “one economic unit” ACP limitation currently imposed via a footnote on homeless shelters. In other words:



As a prelude to eliminating Footnote 309, a Pilot Program could be used to explore administrative alternatives for managing bulk purchasing arrangements for low-income housing complexes and in homeless shelters. To this end, WestHab proposes to run a pilot at its newest WiFi-enabled homeless shelter to test the viability of a centrally administrated system to validate eligible residents in support of a combined ACP discount.

WestHab's Dayspring Commons shelter is a new 63-unit building located in the Nodine Hill community in Southwest Yonkers, NY. It has been open now for four months and is already at full occupancy. It was built, from its initial design, for full WiFi capability with many residents now having never-before internet services at 300 Mbps. level in each apartment.



WestHab already has extensive financial data available on all its residents and will be able to work with its internet provider, currently Crown Castle Fiber (SPIN 143005274) to validate the eligibility of all its residents to support ACP discounts, substantially under \$30/month per resident, sufficient to cover building-wide internet charges of approximately \$1,000 per month.

As a part of the pilot program, E-Rate Central and WestHab would invite any interested Commissioners and staff to visit Dayspring Commons, see the WiFi system itself, and let residents tell them how much full internet access has improved their lives.

Conclusions.

E-Rate Central and Westhab agree with the Commission that “additional steps and innovative approaches are needed” to “help assure that the Affordable Connectivity Program reaches the lowest income Americans.” Homeless Americans, who have been historically unserved in an internet-based economy, particularly need ACP assistance.

ACP can provide internet access for these Americans at a free or highly discounted cost. But access to ACP discounts must be made easier for those living in low-income residential housing and in homeless shelters. E-Rate Central and Westhab believe that this can best be done by aggregating discounts for bulk purchasing arrangements — if only initially in a Pilot Program— at the housing or shelter level.

Respectfully Submitted by:



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